

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding
Microgrids Pursuant to Senate Bill 1339 and
Resiliency Strategies.

Rulemaking 19-09-009

**CLEAN COALITION REPLY COMMENTS ON ADMINISTRATIVE LAW JUDGE'S
RULING REQUESTING COMMENT ON THE MICROGRID INCENTIVE PROGRAM
STAFF PROPOSAL**

/s/ BEN SCHWARTZ

Ben Schwartz

Policy Manager

Clean Coalition

1800 Garden Street

Santa Barbara, CA 93101

Phone: 626-232-7573

ben@clean-coalition.org

August 19, 2022

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding
Microgrids Pursuant to Senate Bill 1339 and
Resiliency Strategies.

Rulemaking 19-09-009

**CLEAN COALITION REPLY COMMENTS ON ADMINISTRATIVE LAW JUDGE’S
RULING REQUESTING COMMENT ON THE MICROGRID INCENTIVE PROGRAM
STAFF PROPOSAL**

I. INTRODUCTION

Pursuant to Rule 6.2 of the California Public Utilities Commission (“the Commission”) Rules of Practice and Procedure, the Clean Coalition respectfully submits these reply comments in response to the *Administrative Law Judge’s Ruling Requesting Comment on the Microgrid Incentive Program (“MIP”) Staff Proposal*, issued at the Commission on July 6, 2022.

One of the main areas of common ground between parties in opening comments is the need for urgent action by the Commission to approve and launch the MIP.¹ Given the dire need for resilience in California and the fact that project development and deployment will require a number of years before being completed, the Commission should strive to release a final decision on the MIP as soon as possible. Ideally, the program launch date should be in 2022 if possible, but at the very latest, the IOUs should have information and a website available by January 1, 2023. Having \$200 million to allocate for resilience in DVCs is an immense step forward, so long as the money is released in a timely fashion and applicants can participate in a deterministic process that will actually result in a Community Microgrid being deployed.

II. DESCRIPTION OF PARTY

The Clean Coalition is a nonprofit organization whose mission is to accelerate the transition to renewable energy and a modern grid through technical, policy, and project development expertise. The Clean Coalition drives policy innovation to remove barriers to procurement and interconnection of distributed energy resources (“DER”) — such as local renewables, demand response, and energy storage — and we establish market mechanisms that realize the full potential of integrating these solutions for optimized economic, environmental, and resilience benefits. The Clean Coalition also

¹ Microgrid Equity Coalition Opening Comments at p. 3, County of Los Angeles Opening Comments at p. 3, and CESA Opening Comments at p. 2.

collaborates with utilities, municipalities, property owners, and other stakeholders to create near-term deployment opportunities that prove the unparalleled benefits of local renewables and other DER.

III. COMMENTS

A. Proposal 1: Provide Additional Information, Maps, or Tools for Identifying Feasible Microgrid Projects

In order for the MIP to be successful, DVCs and their representatives need to easily be able to tell if a project being considered for a MIP application is eligible. The Joint IOUs suggest that between the IOU handbooks and the technical consultation, any other information, “would be redundant.”² On the contrary, for organizations that are not already familiar with the type of information required to apply or how to find it, not having easy access via a map or guidebook, presents a barrier to entry prior to submitting an application. For the sake of potential applicants and the resource allocation of the Joint IOUs, the technical consultation process will not be effective if parties spend the time clarifying the different layers of eligibility criteria rather than considering the specifics of a Community Microgrid project (e.g., sizing the microgrid, technical specifications, or the types of resources that can be interconnected) needed to craft a good application.

Most other parties concur on the importance a heat map so that applicants can easily determine eligibility.³ However, GPI and MEC add the caveats that for the heat map to be useful, the data must be granular enough to provide accurate results and the preparation of a map should not further delay the program launch. The Clean Coalition agrees with both points, which is why our opening comments included a list of the layers that should be included in a final map and showcased Bethany Kwoka’s work mapping the community eligibility criteria. The eligibility criteria maps and the full draft report (see Attachment A) demonstrate the viability of creating a searchable map with granular enough data to be of value to applicants.

The Joint IOU’s suggest that the development of such a heat map would potentially require an investment of, “millions of ratepayer dollars and several more years in another separate portal,” but do not provide any foundation on the monetary/time investment that would be required. It is not as if the development of a heat map would require starting from zero. The Joint IOUs’ Opening Comments discusses the map currently under development based on D. 20-06-017, which

² The Joint IOUs’ Opening Comments at p. 2

³ GPI Opening Comments at p. 4, MEC Opening Comments at p. 4, CESA Opening Comments at p. 6, and RCRC Opening Comments at p. 2.

provides a foundation for a MIP-related heat map and indicate the level of investment necessary to produce a final product.

Moreover, the Commission should reject claims that a heat map would result in oversimplified and inaccurate data.⁴ Despite having a complete list of eligibility criteria and knowledge of the information necessary for a heat map, no specifics beyond this general assertion were provided. Without any examples, it is unclear why a heat map showing MIP eligibility criteria would be too technical for applicants to read or the Joint IOUs to create. Given the existing prototype map the Joint IOUs are developing, it would appear that the opposite is true. The Joint IOUs have expertise gathering data, cleaning data, and developing maps, which means that creating granular layers should be feasible and practical.

IV. CONCLUSION

The Clean Coalition appreciates the opportunity to submit these reply comments and urges the Commission to approve the amended MIP as soon as possible.

/s/ BEN SCHWARTZ
Ben Schwartz
Policy Manager
Clean Coalition
1800 Garden Street
Santa Barbara, CA 93101
Phone: 626-232-7573
ben@clean-coalition.org

Dated: August 19, 2022

⁴ The Joint IOUs' Opening Comments at p. 5